

BEFORE THE
Federal Communications Commission

WASHINGTON, D. C.

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Federal Communications Commission
Office of the Secretary

In the Matter of Advanced
Television Systems and Their
Impact upon the Existing
Television Broadcast Service

)
) MM Docket No. 87-268
)
)

COMMENTS OF
TELEMUNDO GROUP, INC.

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Inc.

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Comments of W57BA, Tampa, FL

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Comments of Hispanic Broadcasters of Tuscon, Inc.,
Tuscon, AZ

Comments of K17CJ, Yakima-Wapato, WA

SUMMARY

Telemundo Group, Inc. ("Telemundo") serves the United States Hispanic community with Spanish-language programming provided via full-power and low power television stations ("LPTV") and cable systems. Telemundo relies heavily on LPTV stations to deliver programming, especially because of the limited availability of cable television channels to carry foreign-language programming.

The Commission should make every attempt to preserve Telemundo's LPTV stations and affiliates in view of the valuable service provided by them to the long-underserved Hispanic community. In designing an ATV implementation scheme, the protection of LPTV service should be an important consideration. To the extent that some LPTV stations may have to be displaced in favor of ATV operations, the Commission should establish procedures to enable those stations to quickly migrate to other available channels in order to minimize interruption of the displaced stations' programming.

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Telemundo Group, Inc. ("Telemundo"), by its attorneys, hereby comments on the Commission's Notice of Proposed Rule Making, FCC 91-337 (released November 8, 1991) ("NPRM") proposing implementation guidelines for advanced television ("ATV").

In four years Telemundo Group, Inc. ("Telemundo") has grown from a network consisting of four stations distributing 2 1/2 hours per week of Spanish-language programming to a network of 45 stations and affiliates providing 130 hours of satellite-delivered programming each week.

The programming distributed by Telemundo is designed to serve the United States Hispanic audience, an already large group that recent census statistics confirm continues to grow at an astonishing rate. A comparison of 1980 and 1990 census

data reveals that the U.S. Hispanic population increased from 14,608,673 to 22,354,059 between 1980 and 1990, an increase of 53%. Historically, the Hispanic audience has been underserved by U.S. television, with only one Spanish-language programmer in existence for over twenty years before Telemundo commenced network operations. The competition that Telmundo has brought to Spanish-language programming has spurred overall improvements in the quantity and quality of information and entertainment programming directed to this important segment of the U.S. audience.

Telemundo has expanded the national audience reach of its network coverage by: (i) acquiring or constructing full-power television stations (Telemundo currently owns seven full-power television stations serving the continental United States and Puerto Rico); (ii) constructing or acquiring existing low power television ("LPTV") stations (Telemundo presently owns seven LPTV stations; and has applications pending for two; (iii) entering network affiliation agreements with full-power and LPTV stations (Telemundo has ten full-power affiliates and 14 LPTV affiliates); and, (iv) to a much more limited degree, obtaining satellite-direct carriage on cable television systems. With its existing outlets, Telemundo's network programming reaches about 20,400,000 Hispanics, or approximately 85% of the country's Hispanic households. National advertisers, however, provide a constant pressure on

Telemundo to increase its national audience reach. 1/ The network is presently attempting to increase its national reach to achieve parity with its competitors by obtaining additional cable carriage and acquiring or affiliating with more LPTV stations.

Telemundo's aggressive efforts to obtain improved network coverage through cable carriage, however, have had limited success, due to lack of available channels on many cable systems. 2/ Moreover, even were Telemundo able to obtain significant additional cable carriage, that medium is far less effective in delivering programming to the Hispanic community than a network comprised of full-power and LPTV stations, insofar as the cable industry estimates that the cable television subscription rate for Hispanic households is only 30%, half of the subscription rate for the general public. Given these practical impediments to obtaining or benefitting from significantly more cable television carriage, Telemundo

1/ As discussed more fully below, national advertisers are essential to the network's economic survival. There is a direct relationship between national advertising revenues and the quality and amount of programming that Telemundo can produce and/or acquire.

2/ As English-language programming sources have multiplied and the number of channels available on cable systems has remained static, cable operators have been reluctant to carry Telemundo's signal.

must rely heavily on additional LPTV outlets both to serve its target audience (Spanish-speaking individuals) and to compete effectively for network advertising dollars with other Spanish-language programmers.

At the present time, LPTV stations provide the only vehicle available to Telemundo to deliver its programming to many key markets. For example, if LPTV stations in the following "major markets" ^{3/} were taken off the air by ATV operations (which is likely, because all of these areas suffer from frequency congestion), Telemundo would have no broadcast coverage whatsoever in: Boston, MA, Washington, DC, Tampa, FL, Stockton, CA, Sacramento, CA, and Hartford-New Haven, CT. That result would deprive Hispanics living in these areas of access to Telemundo's quality programming.

II. The Preservation of LPTV Stations Serves
the Public Interest by Insuring Continued
Service to Minority Audiences

Through its owned LPTV stations and its LPTV affiliates, Telemundo is providing programming addressing the particular and special needs and interests of the Hispanic community, our nation's largest minority community. The

^{3/} In the Notice of Proposed Rule Making, FCC 91-337 (released Nov. 8, 1991) (the "NPRM"), the Commission opined that LPTV stations in "major markets" would likely be displaced by ATV simulcast operators. NPRM at ¶ 30.

continuance of this service is critical to this long-underserved audience. The notion that Telemundo's LPTV service should be protected in the course of developing ATV implementation rules is consonant with the Commission's bedrock principle that the public interest is well-served by a diversity of programming sources. The Commission has emphasized its "historic interest in diversity -- in a wide range of voices and a wide variety of cultural influences" as a "value to be nurtured and defended." See, e.g., Evaluation of the Syndication and Financial Interest Rules, 6 FCC Rcd 3094, 3100 (1991). The Commission has recognized (and the Supreme Court has affirmed) that it has a "mandate" that "requires [it] to promote the public interest by insuring a diversity of programming choices for the American viewer." Id. at 3109; see National Broadcasting Company v. United States, 319 U.S. 190, 223 (1942). The Commission has further observed that this "affirmative mandate to promote diversity [exists] at both the national and local levels." Evaluation of the Syndication and Financial Interest Rules at 3132.

The Commission has specifically encouraged the growth and development of LPTV, precisely in the spirit of promoting diversity of programming services in both rural and urban areas, and to both the general public and to specific population groups. When it first established LPTV service, the Commission stated:

Our goal here is to use over-the-air broadcast mechanisms to help meet service needs and to expand the diversity of programming available to the public. Our concepts of program diversity and service needs, however, do not focus necessarily on a paucity of conventional over-the-air or cable-relayed signals available in the community. Rather, they go to whether identifiable service needs of communities in general, or specific population groups in particular, are being met by existing television sources. Such service needs . . . may exist in urban as well as rural areas. Inquiry Into the Future Role of LPTV and Translators, 68 FCC2d 1525, 1527 (1978).

Significantly, in the same proceeding, the Commission expressed concern that there would be delays in establishing LPTV service in urban areas, due to frequency shortages and mutual exclusivity among applicants: "LPTV authorizations in major urban centers -- where ethnic and minority groups with special needs are highly concentrated -- will be the last to be made." Inquiry Into the Future Role of LPTV and Translators, 51 RR2d 476, 527 (1982) (emphasis added). The Commission should continue its sensitivity to that same concern for ethnic and minority audiences in the instant proceeding. Potential displacement of LPTV facilities by ATV because of frequency congestion will disproportionately affect minority-targeted programming sources both because minorities coincidentally inhabit urban centers where frequency congestion problems

generally arise 4/ and because minority-oriented programming is largely distributed on LPTV stations. Because Telemundo's programming targets Hispanics, its LPTV stations (both owned stations and affiliates) are generally located in or near urban areas. Therefore, Hispanic television viewers will be disproportionately affected if LPTV stations are ousted outright in order to provide spectrum for ATV.

Telemundo's network operations would also suffer dramatically if LPTV coverage were lost. Network advertising revenues, the life-blood of a television network, are dependent upon network coverage. To the extent that a network's coverage area shrinks -- indeed, if only a few important markets are lost 5/ -- its network advertising revenues will follow suit.

4/ For example, Central and Southern California are both major Hispanic population centers and areas already identified as potential frequency congestion problem zones. See Public Notice, Notice of Limited Low Power Television/Television Translator Filing Window From February 10, 1992 Through February 14, 1992, Mimeo No. 20922 (released Dec. 9, 1991). Indeed, included in the FCC's "geographic freeze" areas (where new LPTV applications are prohibited in anticipation of accommodating ATV) are Los Angeles, San Francisco, Sacramento, and Stockton, California. Id.

5/ Spanish-language television markets are ranked according to Hispanic population. Therefore, a television market that would be relatively insignificant to an English-language network might be very important to a Spanish-language network. For example, McAllen-Brownsville, TX, which is the eighth largest Hispanic television market is only ranked 114 under the

[Footnote continued]

The domino effect continues, because lower revenues mean smaller programming budgets, which result in less program production and/or decreases in program quality. If Telemundo loses LPTV affiliates in even a few markets, revenues would be adversely affected, which would make it difficult to continue to offer quality programming. This bleak scenario is even more distressing to Telemundo in view of the lack of such extensive reliance on LPTV by its more long-standing competitors, due to their more extensive cable coverage.

In addition to the significant impact that loss of LPTV affiliates would have on the network, Telemundo's LPTV affiliates themselves would be sharply affected if their channels were appropriated for ATV without provision for substitute frequencies. Indeed, they would go out of business. The employees of these LPTV stations would be out of work, the LPTV licensees would lose their investment in LPTV equipment and facilities, and Hispanic viewers in those markets

5/ [Footnote continued]

Arbitron system. Similarly, El Paso, TX, which is the 11th largest Hispanic television market is ranked 100 under the Arbitron system. Strategy Research Corporation, January 1, 1992, "Rankings of Hispanic Television Markets. Of the top 25 Hispanic television markets, Telemundo operates through LPTV stations in eleven of them. A listing of the top 50 Hispanic television markets as of January 1, 1992 is attached hereto as Exhibit 2.

would lose a Spanish-language television station dedicated to serving local community needs and providing a vital link to news and public affairs programming. For example, W57BA, licensed to Tampa, FL, which serves an Hispanic community of approximately 300,000 and employs 20 people, would go out of business if it lost its channel. Channel 13 Television, Inc., which is the licensee of two LPTV affiliates, employs 40 people and supplies community-oriented local programming to Hispanic viewers in the Hartford, CT and Springfield, MA areas. It, too, would be forced out of business by loss of its broadcast channels. 6/

III. ATV Implementation Procedures Can Minimize the Displacement of LPTV

Because of the direct and detrimental affects that ATV implementation could cause to LPTV, the Commission should be sensitive to the preservation of LPTV as a Spanish-language programming source. If there is no alternative to LPTV displacement by some ATV operations, LPTV stations that are displaced should be permitted to apply for new channels without having to wait for an LPTV filing window. The Commission's existing rules that enable LPTV stations to change channels by

6/ For a more detailed discussion of the potentially devastating effect of ATV implementation on LPTV, see Comments of Telemundo Affiliates (attached hereto as Exhibit 1).

filing modification applications immediately when they are displaced by new full power stations or land mobile operators, should be extended to cover situations where ATV causes displacement. Moreover, the channels to which displaced LPTV stations can migrate should include vacant NTSC channels (including reserved educational channels) or unused (unassigned or unactivated) ATV channels. Displaced LPTV stations should also be permitted to file non-window modification applications to change power, antenna orientation and/or other operating parameters in order to cure interference problems caused by the commencement of ATV simulcast operations. Such provisions in combination with others discussed below, should be adequate to assure near-term continued LPTV operations, especially in the early years of ATV implementation when it is expected that many full-power stations will not have commenced simulcast operation.

The Commission should also apply a much higher standard to extension requests for new or major change full-power and LPTV construction permits after adoption of the Report and Order in this proceeding. This will encourage the rapid construction or modification of those facilities where the licensee truly has the intent (and the resources) to build. It will also serve to recover channels from permittees who do not have the intent (or the resources) to construct the stations. After cancellation of these permits, the channels

will be available for operating LPTV stations that would otherwise be forced off the air by ATV simulcast operations.

In order to further improve spectrum efficiency for use by displaced LPTV facilities, the Commission should also adopt policies to encourage stations to co-locate their ATV transmission facilities at central antenna farms. As the Commission has recognized, co-location of facilities will eliminate the need for some UHF "taboos," thereby improving spectrum efficiency. See, e.g., 47 C.F.R. § 73.525(d). These "taboos," which require that the transmission facilities of a station operating two to five channels above another station (and utilizing substantially higher power) must be located at least 19.5 miles from the transmission facilities of the weaker station. An extreme example of the effectiveness of co-location of similar-power facilities at curing interference problems is cable television, where adjacent channels are stacked on top of each other with no resulting interference. Under the same principle, full-power stations with similar ERP may use co-located antenna facilities without suffering the adverse effects of these "taboos." The co-location of antenna towers also benefits the air safety of the public and the environment.

If there comes a time when there are not sufficient channels available to accommodate all LPTV stations in a market (for example, when all full-power stations are simulcasting in

ATV and NTSC modes), the Commission should adopt a priority system favoring foreign language stations to determine which LPTV stations should receive channels. This priority system properly recognizes the importance of culturally diverse programming sources targeted at minority audiences and promotes preservation of the few programming sources specifically targeted to the Spanish-speaking public.

At the end of the ATV transition period, when all television stations will have switched to ATV, all surrendered NTSC channels likewise should be made available for displaced LPTV stations. These channels, too, should be allocated on a priority basis for the reasons discussed above, with foreign language stations receiving a preference. Moreover, to the extent possible, LPTV stations should be allowed to apply for ATV operation. However, in view of today's very costly estimates for ATV conversion, LPTV stations should have the market-driven option of converting to ATV or of continuing to provide NTSC service.

IV. Conclusion

The valuable public service made available by Telemundo to the more than 22,000,000 Hispanic Americans should not be disrupted by the implementation of ATV. Instead, the Commission should recognize the important contribution to diversity made by LPTV stations -- and more specifically, the

contribution made by the LPTV stations comprising Telemundo's network, that provide culturally diverse programming to an enormous targeted minority audience -- by adopting measures to allow continued operation of these facilities. The adoption of appropriate ATV implementation procedures and policies, as suggested above, will enable ATV and LPTV to co-exist, and will also serve to protect the important public interest goals of diversity.

Respectfully submitted,

HOGAN & HARTSON

By: Susan Wing
Susan Wing by JPC
Jacqueline P. Cleary

Attorneys for Telemundo Group,
Inc.

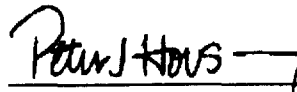
Dated: December 20, 1991

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DECLARATION

I, Peter J. Housman II, President, Business and Corporate Affairs of Telemundo Group, Inc. hereby declare under penalty of perjury as follows:

The foregoing Comments of Telemundo Group, Inc. are true and correct to the best of my knowledge, information and belief.

A handwritten signature in dark ink, appearing to read "Peter J. Housman II", is written over a horizontal line.

Peter J. Housman II

Dated: December 20, 1991

EXHIBIT 1

COMMENTS OF TELEMUNDO AFFILIATES



Channel 13 Television Inc.

886 MAPLE AVENUE - HARTFORD, CONN. 06114

W13BF-TV
HARTFORD, CONN.
W65BX-TV
SPRINGFIELD, MASS.
RADIO 13

TEL: (203) 547-1303
FAX: (203) 549-6834

December 16, 1991

Federal Communications Commission
Washington, D. C.

RE: ATV Proposed Rulemaking
Channel 13 Television, Inc.
W13BF-TV Hartford, CT
W65BX-TV Springfield, MA

Gentlemen:

I, Lucio C. Ruzzier, Sr. am the President of Channel 13 Television, Inc. located in Hartford, Connecticut, which is the licensee of two LPTV stations, Channel 13, W13BF-TV in Hartford, Connecticut and Channel 65, W65BX-TV Springfield, MA.

Channel 13 has been broadcasting since June 14, 1986, Channel 65 has been on the air since June 13, 1991. This letter is sent with comments concerning the Commission's proposed rulemaking concerning ATV.

I believe that the proposed Rulemaking will be not only obviously detrimental to Channel 13 and 65 but also to the members of the communities which the Stations serve. Channel 13 was recently included in the Copyright Office's list of specialty stations since it provides all foreign language programming and provides a service to the community not met by the traditional broadcasters.

During the 5-1/2 years that Channel 13 has been on the air, Channel 13 is clearly providing a need to the community, which is otherwise not being met. Channel's 13 and 65 through affiliation with Telemundo provide quality Spanish-language programming to Hispanic viewers. In addition to Network programming, Channel 13 also produces local programming covering local events, produces a local community interest program, produces and participates in a wide variety of community service programs including fund-raising events for charitable causes. Channel 13 is widely respected in the area because of the services it provides and accessibility to the community.

There are limited sources of news and entertainment available in Spanish within the stations' coverage area being primarily radio stations. Telemundo network programming would not be available if we had to surrender channels for ATV.

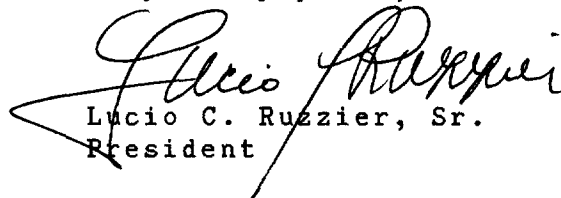
If forced off the air by ATV, Channel 13 and 65 would suffer enormous economic losses. The Stations which employs 40 people, many of whom are Hispanic, would be forced to go out of business if the Commission is unable to develop an ATV implementation plan that can accommodate the stations. The investment made in LPTV by Channels 13 and 65 and large, multiple LPTV owners and small, single station owners should be considered by the FCC when implementing ATV. Although a secondary service, the Commission should recognize the valuable public service provided by LPTV broadcasters and should attempt to minimize the adverse impact of ATV on LPTV.

With the tremendous growth of the Hispanic market, in many cases LPTV's were the only licenses available to broadcasters looking to serve the major Hispanic television markets in this country. In fact, many Spanish-language LPTV's function and Channel 13 and 65 function identically to full power stations offering coverage of local events and community affairs programming. In fact, at times Channel 13 is the sole broadcaster covering some community events.

There is no question that the large Spanish-speaking population within Channel 13 and Channel 65's service areas would suffer greatly by the loss of these stations. If these stations were taken off the air, it would reduce or eliminate Spanish-language television programming available to the public within our service areas.

We believe it would be unfair for the Commission to promote the development and growth of community-based television through LPTV and then not make every effort to protect LPTV stations from displacement by ATV operations.

Very truly yours,


Lucio C. Ruzzier, Sr.
President

LCR:aa



Canal Siete



TELEMUNDO AFFILIATE

W07BZ • W12CD • W12CC

December 16, 1991

Federal Communications Commission
Washington, D.C.

Re: ATV

Gentlemen:

The purpose of this letter is to express our opposition to any FCC action that would force a Low Power Television Station off the air. We understand the FCC is currently considering an ATV channel allocation that would force some LPTV stations off the air and we would like to express our strong concern against this prospect. We would like the FCC to consider the following facts.

W07BZ and W12CD are two on air low power television stations affiliated with The Telemundo Network providing the sole off air television service to the Central Florida Hispanic community. Our station serves this important minority community just as the local full power network stations serve the Anglo community.

We are very involved in our community providing community affair programming such as Nuestra Gente a talk show involving Hispanic leaders of our community. Club de la Amistad is a talent search show helping aspiring artists of our community, and A Su Salud which is a medical program informing the Hispanics of the new advances in medicine and medical tips. Plus, we have a Sunday religious program bringing the Mass to their homes. These community programs augment the network programming. Without our LPTV the important and growing Hispanic community of Central Florida would not have any off air TV news or entertainment. Also, we believe the economics do not exist for a full power Spanish station in Orlando. Therefore, a replacement of LPTV by ATV would leave the Hispanic segment of the Central Florida market area, both residents and tourists alike, without any television.

Very truly yours,

CANAL SIETE, INC

Patricia Brumlik
President

PB:mp



COMMENTS TO THE FCC REGARDING NPRM DUE DECEMBER 20TH

K46CS is a Telemundo Affiliate providing quality Spanish language programming to the 151,000 Hispanic viewers in our coverage area. Through Telemundo 46 participation in COMA the Mexican-American C&C, Fiestas del Llano Sept. 16th celebration, and with COMA on the Cinco De Mayo celebration all combined local participation that was not available before Telemundo 46 and would not be available if we were to have to give up our LPTV. Additionally, the public service announcements in Spanish for our Spanish speaking audience.

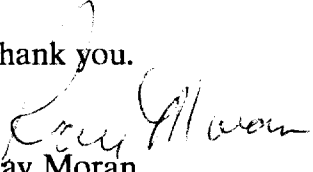
There are limited sources of local and CNN news and entertainment available in Spanish within LPTV station's service area. Telemundo network programming would not be available in K46CS and K44DA station's coverage area if Telemundo 46 had to surrender channel for ATV.

If Telemundo 46 is forced off the air by advanced television, this LPTV station will suffer enormous economic losses. This station -- which employs 8 people -- will go out of business if the Commission is unable to develop an ATV implementation plan that can accommodate ATV. The investment made in LPTV by both large, multiple LPTV owners and small single station owners should be considered by the FCC when implementing ATV. Although a secondary service, the Commission should recognize the valuable public service provided by LPTV broadcasters and should attempt to minimize the adverse impact of ATV and LPTV.

With the tremendous growth of the Hispanic market, in many cases LPTV's were the first and only licenses available to broadcasters looking to serve this major Hispanic television market. In fact, K46CS station functions, identically to full power stations, offering local news, community affairs programming, etc.

There is no question that the large Spanish-speaking population within Telemundo 46's service area would suffer greatly by the loss of this station and K44DA. If this station were taken off the air, it would reduce or eliminate Spanish-speaking television programming available to the general public within the Telemundo 46 service area.

It would be unfair for the Commission to promote the development and growth of community-based television through LPTV and then not make every effort to protect LPTV stations from displacement by ATV operations.

Thank you.

Ray Moran
President
Ramar Communications



December 13, 1991

Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Ms. Searcy:

Through affiliation with Telemundo, W57BA provides quality Spanish-language programming to Hispanic viewers in the Tampa Bay area. There are limited sources of news and entertainment available in Spanish in our area so our television broadcast service is very important. Telemundo network programming would not be available to over 300,000 Hispanics in the Bay area if our low power station had to surrender channel 57 for ATV.

If forced off the air by ATV, LPTV stations all across the country will suffer enormous economic losses. This station - which employs 20 people - will go out of business if the Commission is unable to develop an ATV implementation plan that can accommodate LPTV's. The investment made by our company in Spanish-language low power TV stations in Florida and Texas is considerable. We are a minority-owned enterprise that cannot afford to purchase full power licenses to serve our viewers. Although a secondary service, the Commission should recognize the valuable public service provided by LPTV broadcasters and should attempt to minimize the adverse impact of ATV on LPTV service.

With the tremendous growth of the Hispanic market, in many cases LPTV's were the only licenses available to broadcasters looking to serve the major Hispanic television markets in this country. In fact, many Spanish - language LPTV's function identically to full power stations, offering local news, community affairs programming, etc.

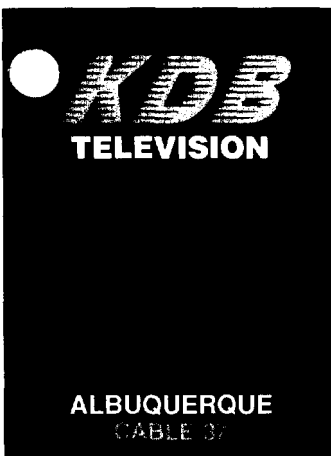
There is no question that the large Spanish-speaking population in the Tampa Bay area would suffer greatly by the loss of this station and of our low power Univision competitor W61BL (also minority owned and operated). If either station were taken off the air, it would reduce or eliminate Spanish-language television programming available to the general public on the West Coast of Florida.

It would be unfair for the Commission to promote the development and growth of community-based television through LPTV and then not make every effort to protect LPTV stations from displacement by ATV operations.

Respectfully,


Mark Jorgenson

The Spanish Language Choice for Tampa Bay
2700 West M. L. King Boulevard, Suite 400, Tampa, FL 33607 - 6377
Phone (813) 879-5757 • Facsimile (813) 877-4466



DECEMBER 16, 1991

FEDERAL COMMUNICATIONS COMMISSION

TO WHOM IT MAY CONCERN:

RE: ATV ALLOCATIONS

AS AN AFFILIATE OF TELEMUNDO, K59DB, A LOW POWER TELEVISION IN ALBUQUERQUE, IS VERY CONCERNED ABOUT THE FCC RULING ABOUT ATV ALLOCATIONS IN MANY MARKETS.


IF THESE ALLOCATIONS FORCE K59DB OFF THE AIR, K59DB, WHICH EMPLOYS 27 PEOPLE WILL GO OUT OF BUSINESS, UNLESS THE COMMISSION IS ABLE TO DEVELOPE AN ATV IMPLEMENTATION PLAN THAT CAN ACCOMODATE ATV.

K59DB SERVES THE LARGE HISPANIC POPULATION OF ALBUQUERQUE AND ITS SURROUNDING AREAS WITH 100% SPANISH PROGRAMMING, INCLUDING SEVERAL LOCAL COMMUNITY PROGRAMS. "BUENOS DIAS NUEVO MEXICO" (GOOD MORNING NEW MEXICO) INCLUDES INTERVIEWS WITH LOCAL PROMINENT COMMUNITY MEMBERS, LOCAL NEWS UPDATES, PUBLIC SERVICE INFORMATION AND TRAFFIC REPORTS. K59DB'S "CONTACTO 59" PROGRAM FEATURES LOCAL COMMUNITY EVENTS EVERY SUNDAY MORNING 9AM-10AM. K59DB ALSO BROADCASTS LOCAL NEWS UPDATES TO INFORM THE HISPANIC COMMUNITY EACH EVENING.

THERE IS NO QUESTION THAT THE LARGE (44%) SPANISH-SPEAKING POPULATION WITHIN K59DB'S SERVICE AREA WOULD SUFFER GREATLY BY THE LOSS OF THIS STATION. IF K59DB WERE TAKEN OFF THE AIR IT WOULD GREATLY REDUCE SPANISH-LANGUAGE TELEVISION PROGRAMMING AVAILABLE TO THE GENERAL PUBLIC WITHIN THE ALBUQUERQUE METRO AREA.

PLEASE SERIOUSLY CONSIDER THE CONSEQUENCES OF REMOVING KSDOB,
THE IMPORTANCE OF ITS PROGRAMMING TO ALBUQUERQUE, AND
UNDERSTAND THE TREMENDOUS IMPACT OUR STATION HAS ON THE
COMMUNITY. KSDOB MUST CONTINUE TO SERVE THE ALBUQUERQUE AREA.

SINCERELY,

A handwritten signature in black ink, appearing to read "Kelly Cunningham-Nunson". The signature is written in a cursive, flowing style.

KELLY CUNNINGHAM-NUNSON
GENERAL MANAGER